

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA (Pittsburgh)

IN RE:)
) Case No. 20-20875-CMB
NASH BUILDING COMPANY,)
) Chapter 7
Debtor)
)
ROBERT H. WYCHE,)

Movant,

v.

NASH BUILDING COMPANY;
MONROE NASH; TERRA
INVESTMENTS, LLC; AND ROBERT
SHEARER, CHAPTER 7 TRUSTEE,

Respondents.

**JOINDER OF KNICKERBOCKER RUSSELL CO., INC. IN MOTION TO COMPEL
FILED BY ROBERT H. WYCHE**

AND NOW comes Knickerbocker Russell Co., Inc. (“Knickerbocker”), by and through its undersigned counsel, Pettit & Mihok, PLLC, and files this joinder to the Motion to Compel filed by Robert H. Wyche (“Motion to Compel”), stating as follows:

1. Nash Building Company (“Debtor”) filed a voluntary petition for relief under Chapter 7 of the United States Bankruptcy Code, 11 U.S.C. § 101 et seq., on March 6, 2020.
2. No proof of claim deadline was established.
3. Knickerbocker was not notified of the bankruptcy filing through the Debtor or his counsel.
4. Knickerbocker believes and, therefore, avers that the Debtor comingled funds with other entities owned by Monroe Nash and/or operated as the alter ego of other entities owned by Monroe Nash.

WHEREFORE, Knickerbocker requests this Court enter an Order, substantially in the form submitted and attached to Robert H. Wyche's Motion to Compel, ordering the Debtor to provide full and complete responses to the discovery requests submitted by Robert H. Wyche and further relief as this Court deems just and proper.

Respectfully submitted,

By: /s/ Jennifer Tis Mihok
Jennifer Tis Mihok, Esquire
PA I.D. No. 203751
Pettit & Mihok, PLLC
3700 Butler Street
Suite 306
Pittsburgh, PA 15201
Telephone (412) 860-0907
jtm@pettitmihok.com
Attorneys for Knickerbocker Russell Co., Inc.